

MARK HARDEE #6-4137
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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA)
)
)
Plaintiff)
)
)
vs) Case No: 1:23-cr-00031-ABJ
)
)
CHRISTOPHER BAKER)
)
)
Defendant)

MOTION FOR APPOINTMENT OF PRIVATE INVESTIGATOR

COMES NOW, the Defendant, by and through his counsel, Mark C. Hardee, and in his Motion for Appointment of Private Investigator does allege and state:

1. The Defendant has been indicted for violations of 21 U.S.C. §§ 841(a)(1), (b)(1)(C), Distribution of Fentanyl Resulting in Death, Distribution of Fentanyl Resulting in Serious Bodily Injury, and Distribution of Fentanyl.
2. That Counsel for the Defendant is currently in the process of investigating the facts and circumstances of the case including investigative reports and analysis.
3. That Counsel for the Defendant has determined that a private investigator is required to independently evaluate certain evidence in the case, and that such expert is essential for an effective defense against the indictment.
4. That Counsel for the Defendant has contacted Greg Taylor, Private Investigator, and believes that Mr. Taylor is qualified and able to provide the necessary assistance needed to investigate the multiple people involved in this case. Mr. Taylor has agreed to provide the

necessary services at the rate of \$75.00/hr and Defendant seeks authorization of up to eighty (80) hours to utilize private investigator, Greg Taylor.

5. That it is necessary for Counsel for the Defendant to provide relevant documents from the discovery file to the expert for independent analysis.

WHEREFORE the Defendant prays for the following:

1. That the Court grant the appointment of Greg Taylor as private investigator for the Defendant at the rate of \$75.00/hr.

2. That the Court grant Counsel for the Defendant authority to reproduce relevant documents from discovery and provide them to the private investigator as necessary.

3. That the Court decree such other additional and further relief as the Court deems just and equitable.

DATED this 4th day of April, 2023.

CHRISTOPHER BAKER

BY

/s/ Mark C. Hardee
MARK C. HARDEE #6-4137
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CERTIFICATE OF SERVICE

I Mark C. Hardee certify that a true and correct copy of the foregoing Motion has been forwarded to Kerry Jacobson, Asst U.S. Attorney, via electronic filing, on this 4th day of April, 2023.

/s/ Mark C. Hardee
Mark C. Hardee